

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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KRISTOPHER R. OLSON, :
CHRISTOPHER LOPEZ, WARREN :
BARBER, CHRISTOPHER CLIFFORD :
and ERIK LIPTAK, :
Plaintiffs, : 20 Civ. 632 (JSR)
v. : 20 Civ. 1000 (JSR)
MAJOR LEAGUE BASEBALL; MLB :
ADVANCED MEDIA LP; HOUSTON :
ASTROS, LLC; and BOSTON RED SOX :
BASEBALL CLUB, LP, :
Defendants.
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ORAL ARGUMENT REQUESTED

**DEFENDANTS MAJOR LEAGUE BASEBALL AND
MLB ADVANCED MEDIA LP'S NOTICE OF MOTION TO DISMISS**

PLEASE TAKE NOTICE that upon the accompanying (i) Memorandum of Law, dated February 21, 2020, and (ii) the Declaration of John L. Hardiman, dated February 21, 2020 and the exhibits thereto, the undersigned Defendants Major League Baseball and MLB Advanced Media LP will move this Court, before the Honorable Jed S. Rakoff, at the Daniel Patrick Moynihan United States Courthouse, Courtroom 14B, 500 Pearl Street, New York, New York, on March 20, 2020 at 9:00 a.m., or at such other date and time determined by the Court, for an Order dismissing the Amended Complaint in its entirety with prejudice for failure to state a claim upon which relief can be granted under Federal Rule of Civil Procedure 12(b)(6), and granting such other and further relief as the Court may deem just and proper.

As set forth in the Court's Civil Case Management Plan (ECF No. 17), Plaintiffs shall file any opposition to this motion by March 6, 2020, and Defendants shall file any reply by March 13, 2020.

Dated: February 21, 2020
New York, New York

Respectfully submitted,

/s/ John L. Hardiman
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